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October 1, 2020

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Hon. Colleen McMahon, Chief Judge
United States District Court
Southern District of New York
500 Pearl Street, Room 2250
New York, NY 10007

VIA ECF

Re: *U.S. Security Holdings, Inc. et al. v. Randy Andrews*, Case No. 1:19-cv-8025
(CM): Joint Letter Regarding Summary Judgment Exhibits

Dear Chief Judge McMahon:

MEMO ENDORSED

This letter addresses two separate motions for leave to file exhibits under seal in connection with Plaintiffs' Motion for Partial Summary Judgment on Liability.

First, Plaintiffs U.S. Security Holdings, Inc. and U.S. Security Associates Holdings, Inc. hereby withdraw, in part, Plaintiffs' Motion for Leave to File Under Seal certain exhibits to Plaintiffs' Motion for Partial Summary Judgment (Dkt. 18). Specifically, Plaintiffs withdraw their request for leave to file under seal Exhibits A, B, J, and PPP to the Declaration of Sarah Walsh— Dkt. 20-1, 20-2, 20-10, 20-19. These were are all documents Plaintiffs produced in discovery.

Second, today, Plaintiffs filed another motion to seal (Dkt. 59) two exhibits in support of Plaintiffs' Reply in Support of their Motion for Partial Summary Judgment, Exhibits QQQ and RRR to the Declaration of Brian Sher. These two exhibits are comprised of documents produced by Defendant and/or Andrews Global Security, Inc. with "HIGHLY CONFIDENTIAL" designations.

The only documents that then remain the subject of sealing requests are documents produced as "CONFIDENTIAL" or "HIGHLY CONFIDENTIAL" by Defendant and/or Andrews Global Security, Inc. (Exhibits FF, GG, KK, LL, MM, OO, PP, QQ, RR, SS, and GGG to the Declaration of Charlene Wang (Dkt. 21-14, 21-15, 21-20, 21-21, 21-22, 21-24, 21-25, 21-26, 21-27, 21-28, 21-42) and Exhibits QQQ and RRR to the Declaration of Brian Sher (Dkt. 60-1, 60-2).)

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The parties are cognizant of Your Honor's Ruling dated September 22, 2020 (Dkt. 54) on Plaintiffs' Motion for Leave to File Under Seal certain exhibits to Plaintiffs' Opposition to Defendant's Omnibus Motion to Dismiss, Transfer, or Stay (Dkt. 46). The parties will thus be meeting and conferring next week to discuss whether Defendant and Andrews Global are willing to withdraw their confidentiality designations. The parties are hopeful an agreement can be reached and Plaintiffs can withdraw their two pending motions for leave to file exhibits under seal.

Plaintiffs respectfully request that the Court still consider all of these exhibits in connection with Plaintiffs' Motion for Partial Summary Judgment and Defendant's Omnibus Motion.

Respectfully submitted,

/s/ Noah M. Weissman, counsel for Plaintiffs

/s/ Robert Rando, counsel for Defendant (with permission)